

2010R00082/BAH

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

MOSHE ALTMAN

(a/k/a "Michael" Altman)

:
:
:
:
:
:
:
:
:
:
:

Hon.

Crim. No. 10-

18 U.S.C. §§ 666(a)(2),
981(a)(1), 982(a)(1),
1951(a), 1956(a)(3), 1956(h)
& § 2; 28 U.S.C. § 2461

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT 1

(Conspiracy to Obstruct Commerce by Extortion Under
Color of Official Right - 18 U.S.C. § 1951(a))

1. At all times relevant to Count 1 of this

Indictment:

a. Defendant MOSHE ALTMAN, a/k/a "Michael Altman,"
(hereinafter, "ALTMAN") was a real estate developer based in
Hudson County who maintained a place of business on Central
Avenue in Union City, New Jersey (hereinafter, the "Business").

b. Co-conspirator John Guarini (hereinafter,
"Guarini") served as a Property Improvement Field Representative
at the City of Jersey City, New Jersey Department of Housing,
Economic Development and Commerce. In this capacity, Guarini was
responsible for, among other things, providing general
maintenance and repair to buildings in a manner that complied

with pertinent federal, state, and local standards, codes, regulations and procedures, including zoning standards.

c. There was a cooperating witness (hereinafter, "the CW") who, at the direction of the Federal Bureau of Investigation (the "FBI"), held himself out as a real estate developer interested in development in the greater Jersey City area. The CW represented that the CW did business in numerous states, including New York and New Jersey, and that the CW paid for goods and services in interstate commerce.

The Conspiracy

2. In or about July 2007, in Hudson County, in the District of New Jersey and elsewhere, defendant

MOSHE ALTMAN

did knowingly and willfully conspire and agree with others to obstruct, delay and affect interstate commerce by extortion under color of official right -- by, among other things, arranging for a corrupt cash payment to be obtained by John Guarini from another, with that person's consent, in exchange for Guarini's official assistance in government matters of the City of Jersey City, as specific opportunities arose.

3. It was the object of the conspiracy for ALTMAN to facilitate Guarini obtaining payment from the CW in exchange for Guarini's official assistance in obtaining certain official approvals in relation to properties that the CW represented that

he planned to develop in Jersey City, as specific opportunities arose.

4. It was part of the conspiracy that:

a. On or about July 10, 2007, ALTMAN met with the CW at the Business. During this meeting, ALTMAN explained to the CW that ALTMAN had arranged for the CW to make a corrupt cash payment to Guarini in exchange for zoning approvals for properties that the CW purportedly was planning to develop in Jersey City. ALTMAN also told the CW that ALTMAN had made corrupt cash payments to Guarini in the past in exchange for approvals and other official assistance.

b. On or about July 11, 2007, ALTMAN met with the CW at the Business. During that meeting, ALTMAN advised the CW that ALTMAN would introduce the CW to Guarini in the building's boiler room, where the meeting would take place. ALTMAN told the CW, "in terms of getting zoning and getting approvals, John's the man."

c. Later on or about July 11, 2007, ALTMAN, Guarini, and the CW met at a building in Jersey City. After entering the building, ALTMAN informed Guarini that the CW was looking for a "comfort level" on "zoning" and other matters regarding properties that the CW represented that he planned to develop in Jersey City. Guarini responded, "[y]ou're not gonna have any problem with anything with me . . . whatever we have to do, I can get it done." Then, Guarini explained that he could help the CW

gain approval for more units at such property developments:

"[w]orst-case scenario...we have to put in for a variance...go before the Board of Adjustment, we present the set of plans, the whole bit, but I get the blessing from everybody up above for that to go through."

d. As the meeting continued, ALTMAN and Guarini led the CW to the boiler room of the building. Guarini then accepted two envelopes from the CW, each containing approximately \$10,000 in cash, in exchange for Guarini's official assistance in obtaining official approvals related to properties the CW purportedly planned to develop in Jersey City. Guarini was advised by the CW that the \$20,000 was "on deposit" and there would be additional payments in exchange for Guarini's future official assistance. Guarini was further advised by the CW, "[t]ake care of me. I'll take care of you," to which Guarini replied, "Absolutely." To create the pretext of an inspection, Guarini stated, "Everything looks good here," as he exited the building.

In violation of Title 18, United States Code, Section 1951(a).

COUNT 2

(Attempted Obstruction of Interstate Commerce by Extortion
Under Color of Official Right -
18 U.S.C. § 1951(a) and § 2)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about July 11, 2007, in Hudson County, in the District of New Jersey, and elsewhere, defendant

MOSHE ALTMAN

and others did knowingly and willfully attempt to obstruct, delay and affect interstate commerce, by extortion under color of official right - that is, by arranging for a corrupt cash payment to be obtained by John Guarini from another, with that person's consent, in exchange for Guarini's official assistance in government matters of the City of Jersey City, as specific opportunities arose.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT 3
(Bribery Concerning Federal Programs -
18 U.S.C. § 666(a)(2) and § 2)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. At all times relevant to Count 3 of this Indictment, the City of Jersey City received benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other forms of federal assistance in a one-year period as defined in Title 18, United States Code, Sections 666(b) and 666(d)(5).

3. In or about July 2007, in Hudson County, in the District of New Jersey, and elsewhere, defendant

MOSHE ALTMAN

did knowingly and corruptly give, offer, and agree to give a thing of value, namely a cash payment totaling approximately \$20,000 to a City of Jersey City official, namely John Guarini, with intent to influence and reward Guarini in connection with a business, transaction, and series of transactions of the City of Jersey City involving a thing of value of \$5,000 and more.

In violation of Title 18, United States Code, Section 666(a)(2) and Section 2.

COUNT 4

(Conspiracy to Launder Money - 18 U.S.C. § 1956(h))

1. Paragraphs 1(a) and 1(c) of Count 1 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. At all times relevant to Count 4 of this Indictment:

a. Co-conspirator Itzak Friedlander, a/k/a "Isaac Friedlander," (hereinafter "Friedlander") was a business partner of ALTMAN.

b. Co-conspirator Shimon Haber (hereinafter "Haber") was a real estate developer who worked in New York and New Jersey.

c. ALTMAN, Haber and Friedlander did not hold licenses to transmit or remit money.

d. Gmach Shefa Chaim (sometimes referred to as "Gemach Shefa Chaim") was a purported charitable organization that maintained its offices, books and records at the Business. Gmach Shefa Chaim accepted deposits from individuals and re-deposited such monies into accounts at Valley National Bank in Union City, New Jersey, among other locations, that were held in its own name. Gmach Shefa Chaim maintained books and records that tracked the financial activities of its depositors, but the financial transactions that Gmach Shefa Chaim conducted at, and recorded through, Valley National Bank otherwise were not

traceable to the individuals who had deposited money with Gmach Shefa Chaim. Friedlander was a client of Gmach Shefa Chaim, and was identified as having Client Account #19 in the books and records of Gmach Shefa Chaim.

e. Among the accounts that Gmach Shefa Chaim maintained at Valley National Bank in Union City, New Jersey and held in its own name were "GSC Account #1," "GSC Account #2," and "GSC Account #3." More than \$1,500,000 was transferred from GSC Accounts #1 and #2 into GSC Account #3, where the monies were commingled.

f. Boyoner Gemilas Chesed (sometimes referred to as "Boyen Gimilas Chesed" or "BGC") was a purported charitable organization that held an account at JP Morgan Chase Bank in Newark, New Jersey (hereinafter "BGC Account #1") and two accounts at Capital One Bank in Brooklyn, New York (formerly North Fork Bank) (hereinafter "BGC Account #2" and "BGC Account #3").

g. VS Development was an entity that held an account at JP Morgan Chase Bank in Newark, New Jersey (hereinafter the "VSD Account").

h. Valley National Bank, JP Morgan Chase Bank and Capital One Bank were financial institutions engaged in interstate commerce.

The Conspiracy

3. From in or about February 2007 to in or about July 2009, in Hudson County, in the District of New Jersey, and elsewhere, defendant

MOSHE ALTMAN

knowingly, willfully, and with intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activities, that is, bank fraud contrary to Title 18, United States Code, Section 1344, trafficking in counterfeit goods, contrary to Title 18, United States Code, Section 2320, and the concealment of property belonging to the estate of a debtor from a federal bankruptcy trustee and bankruptcy court, contrary to Title 18, United States Code, Section 152, conspired and agreed with others to conduct financial transactions affecting interstate commerce and involving the use of financial institutions engaged in interstate commerce, specifically, exchanging U.S. currency in return for checks represented by the CW at the direction, and with the approval, of a federal official authorized to investigate and prosecute violations of Title 18, United States Code, Section 1956, to be the proceeds of specified unlawful activities, contrary to Title 18, United States Code, Section 1956(a)(3).

4. It was the object of the conspiracy for ALTMAN, with the assistance of Friedlander and Haber, to convert checks

that were represented by the CW to be the proceeds of unlawful activities (namely, bank fraud, trafficking in counterfeit goods, and concealment of property from a federal bankruptcy trustee and bankruptcy court) into cash in order to conceal and disguise the nature and other aspects of the proceeds, in exchange for a money laundering fee.

5. It was part of the conspiracy that:

a. ALTMAN held himself out as having a "contact" who used charitable organizations as fronts for laundering money.

b. ALTMAN, with the assistance of Haber and Friedlander, schemed to launder checks that were represented by the CW to be the proceeds of the unlawful activities of bank fraud, trafficking in counterfeit goods, and concealing assets involved in a federal bankruptcy proceeding, in order to provide cash to the CW for the CW's purported use, including cash to bribe local government officials with regard to purported real estate development projects. In this regard, ALTMAN held himself out as being able to facilitate bribes to local government officials to obtain approvals and other official action with respect to real estate development projects in Hudson County and elsewhere. ALTMAN also recounted to the CW the details of some of the bribes that he represented that he had paid to local government officials in the past.

c. ALTMAN and Haber from time to time employed the terms "washing machine" and "laundromat" to refer to the means

and methods by which ALTMAN and others could launder the proceeds of the specified unlawful activities for the CW.

d. While discussing the details of their money laundering arrangement, ALTMAN and Haber directed the CW to write down certain questions that the CW had, instead of verbally articulating those questions, and provided written answers to those questions, in order to avoid being overheard.

e. ALTMAN, with the occasional assistance of Friedlander, accepted checks from the CW that were represented by the CW to be the proceeds of specified unlawful activities.

f. ALTMAN directed the CW to make the checks payable to charitable organizations that were to be used as fronts for laundering money, including Gmach Shefa Chaim and Boyoner Gemilas Chesed. ALTMAN also directed the CW to make checks payable to other parties that were to serve as fronts for laundering money, including "VS Development" and "Holtzer."

g. ALTMAN caused the checks to be deposited into accounts for Gmach Shefa Chaim, Boyoner Gemilas Chesed and VS Development at financial institutions, including Valley National Bank, JP Morgan Chase Bank and Capital One Bank (formerly North Fork Bank).

h. ALTMAN and Friedlander delivered the cash to the CW a short time after receiving the checks from the CW. On at least four occasions, ALTMAN delivered the entire amount of the

cash due the CW on the same day as the CW delivered checks to
ALTMAN.

i. ALTMAN charged, and received from, the CW a fee of
approximately 15% to launder these monies.

j. ALTMAN sometimes underpaid, and overpaid, the CW
when delivering cash to the CW.

k. Friedlander used his account at Gmach Shefa Chaim
to launder checks that ALTMAN had accepted from the CW.

l. Between approximately May 2007 and June 2009,
ALTMAN engaged in approximately 15 money laundering transactions
with the CW in which ALTMAN converted approximately \$668,000 in
checks that the CW represented to be proceeds of specified
unlawful activity into approximately \$547,350 in cash, and
retained approximately \$109,300 in fees to be shared among ALTMAN
and others for laundering these monies.

m. On or about the dates set forth below, and at the
Business unless otherwise noted, ALTMAN accepted, and caused the
acceptance of, checks from the CW that were represented by the CW
to ALTMAN to be proceeds of specified unlawful activity and
delivered cash to the CW to complete the Money Laundering
Transactions, as set forth below:

TRANS. #	CHECKS ACCEPTED / MEETING DATE	APPROX. AMOUNT OF CASH DELIVERED / MEETING DATE (\$)
1	\$18,000 check to "Gmach Shefa Chaim" dated 5/21/2007 May 21, 2007	\$15,300 June 12, 2007
2	\$75,000 check to "Gemach Shefa Chaim" dated 6/11/2007 June 12, 2007	\$54,800 June 26, 2007 \$9,050 July 5, 2007
3	\$50,000 check to "Gemach Shefa Chaim" dated 6/26/2007 June 26, 2007	\$30,000 July 16, 2007 \$12,500 July 18, 2007
4	\$75,000 cashier's check to "Gemach Shefa Chaim" dated 7/10/2007 July 16, 2007	\$39,500 July 30, 2007 \$24,500 Aug. 10, 2007
5	\$50,000 cashier's check to "Boyen Gimilas Chesed" dated 8/8/2007 Aug. 8, 2007 (at 5 th Street in Union City, by Friedlander)	\$20,000 Aug. 10, 2007 \$22,500 Aug. 23, 2007
6	\$25,000 cashier's check to "Gemach Shefa Chaim" dated 9/11/2007 Sept. 11, 2007	\$21,250 Sept. 25, 2007
7	\$30,000 cashier's check to "Gemach Shefa Chaim" dated 10/9/2007 Oct. 9, 2007	\$25,800 Oct. 15, 2007
8	\$25,000 cashier's check to "Gemach Shefa Chaim" dated 12/18/2007 Dec. 18, 2007	\$21,250 Jan. 7, 2008
9	\$25,000 cashier's check to "Gemach Shefa Chaim" dated 7/9/2008 July 10, 2008	\$15,250 July 24, 2008 \$6,000 Aug. 5, 2008

TRANS. #	CHECKS ACCEPTED / MEETING DATE	APPROX. AMOUNT OF CASH DELIVERED / MEETING DATE(S)
10	<p>\$25,000 cashier's check to "Boyan" dated 9/3/2008</p> <p>\$75,000 cashier's check to "VS Development" dated 9/3/2008</p> <p>Sept. 4, 2008</p>	\$85,000 Sept. 4, 2008
11	<p>\$50,000 cashier's check to "Boyan Gemilas Chesed" dated 10/28/2008</p> <p>Oct. 29, 2008</p>	\$42,500 Oct. 29, 2008
12	<p>\$25,000 cashier's check to "Shefa Chaim" dated 1/28/2009</p> <p>Feb. 5, 2009</p>	\$21,250 Feb. 5, 2009
13	<p>\$5,000 cashier's check to "Holtzer" dated 3/31/2009</p> <p>\$5,000 cashier's check to "Holtzer" dated 3/31/2009</p> <p>\$5,000 cashier's check to "Holtzer" dated 3/31/2009</p> <p>\$10,000 cashier's check to "Gemilas Chesed" dated 3/31/2009</p> <p>March 31, 2009</p>	\$21,000 March 31, 2009
14	<p>\$9,500 cashier's check to "Shefa Chaim" dated 5/6/2009</p> <p>\$8,000 cashier's check to "Gemillas Chesed" dated 5/6/2009</p> <p>\$7,500 cashier's check to "Gemillas Chesed" dated 5/6/2009</p> <p>May 7, 2009</p>	\$5,000 May 7, 2009
		\$14,900 May 13, 2009

TRANS. #	CHECKS ACCEPTED / MEETING DATE	APPROX. AMOUNT OF CASH DELIVERED / MEETING DATE(S)
15	\$40,000 cashier's check to "BGC" dated 5/26/2009 \$30,000 cashier's check to "BGC" dated 5/26/2009 June 18, 2009	\$40,000 June 19, 2009 (at Brooklyn, New York, by an associate of ALTMAN)

In violation of Title 18, United States Code, Section
1956(h) .

COUNTS 5 to 41

(Money Laundering - 18 U.S.C. § 1956(a)(3))

1. Paragraphs 1, 2, and 5 of Count 4 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about the dates set forth below, in Hudson County, in the District of New Jersey, and elsewhere, defendant

MOSHE ALTMAN

knowingly and willfully conducted and attempted to conduct financial transactions as set forth below involving property represented by a person acting at the direction of federal law enforcement authorities to be the proceeds of specified unlawful activities, specifically, bank fraud contrary to Title 18, United States Code, Section 1344, trafficking in counterfeit goods, contrary to Title 18, United States Code, Section 2320, and the concealment of property belonging to the estate of a debtor from a federal bankruptcy trustee and bankruptcy court, contrary to Title 18, United States Code, Section 152, with the intent to conceal and disguise the nature, location, source, ownership, and control of the property believed to be proceeds of specified unlawful activity:

COUNT	DESCRIPTION OF FINANCIAL TRANSACTION AND APPROX. AMOUNT OF TRANSACTION	DATE
5	Deposit of \$18,000 check to "Gmach Shefa Chaim" dated 5/21/2007 into GSC Account #1 in furtherance of Laundering Transaction #1	May 23, 2007
6	Delivery of \$15,300 in cash to complete Laundering Transaction #1	June 12, 2007
7	Deposit of \$75,000 check to "Gemach Shefa Chaim" dated 6/11/2007 into GSC Account #1 in furtherance of Laundering Transaction #2	June 15, 2007
8	Delivery of \$54,800 in cash as part of Laundering Transaction #2	June 26, 2007
9	Delivery of \$9,050 in cash to complete Laundering Transaction #2	July 5, 2007
10	Deposit of \$50,000 check to "Gemach Shefa Chaim" dated 6/26/2007 into GSC Account #1 in furtherance of Laundering Transaction #3	July 6, 2007
11	Delivery of \$30,000 in cash as part of Laundering Transaction #3	July 16, 2007
12	Delivery of \$12,500 in cash to complete Laundering Transaction #3	July 18, 2007
13	Deposit of \$75,000 cashier's check to "Gemach Shefa Chaim" dated 7/10/2007 into GSC Account #1 in furtherance of Laundering Transaction #4	July 19, 2007
14	Delivery of \$39,500 in cash as part of Laundering Transaction #4	July 30, 2007
15	Delivery of \$24,500 in cash to complete Laundering Transaction #4	Aug. 10, 2007
16	Deposit of \$50,000 check to "Boyen Gimilas Cheshed" dated 8/8/2007 into BGC Account #2 in furtherance of Laundering Transaction #5	Aug. 9, 2007
17	Delivery of \$20,000 in cash as part of Laundering Transaction #5	Aug. 10, 2007
18	Delivery of \$22,500 in cash to complete Laundering Transaction #5	Aug. 23, 2007

COUNT	DESCRIPTION OF FINANCIAL TRANSACTION AND APPROX. AMOUNT OF TRANSACTION	DATE
19	Deposit of \$25,000 cashier's check to "Gemach Shefa Chaim" dated 9/11/2007 into GSC Account #1 in furtherance of Laundering Transaction #6	Sept. 12, 2007
20	Delivery of \$21,250 in cash to complete Laundering Transaction #6	Sept. 25, 2007
21	Deposit of \$30,000 cashier's check to "Gemach Shefa Chaim" dated 10/9/2007 into GSC Account #1 in furtherance of Laundering Transaction #7	Oct. 18, 2007
22	Delivery of \$25,800 in cash to complete Laundering Transaction #7	Oct. 15, 2007
23	Deposit of \$25,000 cashier's check to "Gemach Shefa Chaim" dated 12/18/2007 into GSC Account #1 in furtherance of Laundering Transaction #8	Dec. 21, 2007
24	Delivery of \$21,250 in cash to complete Laundering Transaction #8	Jan. 7, 2008
25	Deposit of \$25,000 cashier's check to "Gemach Shefa Chaim" dated 7/9/2008 into GSC Account #1 in furtherance of Laundering Transaction #9	July 11, 2008
26	Delivery of \$15,250 in cash as part of Laundering Transaction #9	July 24, 2008
27	Delivery of \$6,000 in cash to complete Laundering Transaction #9	Aug. 5, 2008
28	Deposit of \$25,000 cashier's check to "Boyan" dated 9/3/2008 into BGC Account #1 in furtherance of Laundering Transaction #10	Sept. 10, 2008
29	Deposit of \$75,000 cashier's check to "VS Development" dated 9/3/2008 into the VSD Account in furtherance of Laundering Transaction #10	Sept. 8, 2008
30	Delivery of \$85,000 in cash to complete Laundering Transaction #10	Sept. 4, 2008
31	Deposit of \$50,000 cashier's check to "Boyan Gemilas Chessed" dated 10/28/2008 into BGC Account #1 in furtherance of Laundering Transaction #11	Nov. 10, 2008

COUNT	DESCRIPTION OF FINANCIAL TRANSACTION AND APPROX. AMOUNT OF TRANSACTION	DATE
32	Delivery of \$42,500 in cash to complete Laundering Transaction #11	Oct. 29, 2008
33	Deposit of \$25,000 cashier's check to "Shefa Chaim" dated 1/28/2009 into GSC Account #2 in furtherance of Laundering Transaction #12	Feb. 12, 2009
34	Delivery of \$21,250 in cash to complete Laundering Transaction #12	Feb. 5, 2009
35	Deposit of \$8,000 cashier's check to "Gemillas Chased" dated 5/6/2009 into BGC Account #1 in furtherance of Laundering Transaction #14	May 8, 2009
36	Deposit of \$7,500 cashier's check to "Gemillas Chased" dated 5/6/2009 into BGC Account #1 in furtherance of Laundering Transaction #14	May 8, 2009
37	Delivery of \$5,000 in cash as part of Laundering Transaction #14	May 7, 2009
38	Delivery of \$14,900 in cash as part of Laundering Transaction #14	May 13, 2009
39	Deposit of \$40,000 cashier's check to "BGC" dated 5/26/2009 into BGC Account #1 in furtherance of Laundering Transaction #15	June 19, 2009
40	Deposit of \$30,000 cashier's check to "BGC" dated 5/26/2009 into BGC Account #3 in furtherance of Laundering Transaction #15	June 19, 2009
41	Delivery of \$40,000 in cash as part of Laundering Transaction #15	June 19, 2009

In violation of Title 18, United States Code, Section 1956(a)(3) and Section 2.

First Forfeiture Allegation

As a result of committing the aforementioned offenses in violation of Title 18, United States Code, Sections 1951(a) and 666(a)(2), as alleged in Counts 1 to 3 of this Indictment, ALTMAN shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, all property, real and personal, that constituted or was derived from proceeds traceable to the commission of the offenses, including but not limited to, approximately \$20,000 in United States currency, in that such sum constituted or was derived from proceeds traceable to the commission of the offenses of bribery of a local government official and conspiracy and attempt to obstruct commerce by extortion under color of official right.

If any of the above-described forfeitable property, as a result of any act or omission of ALTMAN:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of ALTMAN up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461.

Second Forfeiture Allegation

As a result of committing the aforementioned offenses in violation of Title 18, United States Code, Sections 1956(a)(3) and 1956(h), as alleged in Counts 4 to 41 of this Indictment, ALTMAN shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), any property, real and personal, that was involved in such offense or that was traceable to such property, including but not limited to, the property identified in the table below, in that such property was involved in such offense, or traceable to such property.

1	Approximately \$668,000 in United States currency as identified in Counts 4 to 41 of this Indictment
2	Approximately \$508,985.21 seized on or about July 23, 2009 from Account No. 54169097 held in the name of Gmach Shefa Chaim, at Valley National Bank, previously identified as "GSC Account #3."
3	Approximately \$146,163.38 seized on or about July 23, 2009 from Account No. 3404009486 held in the name of Boyoner Gemilas Chessed at Capital One Bank (formerly North Fork Bank), previously identified as "BGC Account #3."
4	Approximately \$249.94 seized on or about July 23, 2009 from Account No. 6003129765 held in the name of Boyoner Gemilas Chessed at JP Morgan Chase Bank, previously identified as "BGC Account #1."
5	Approximately \$238.30 seized on or about July 23, 2009 from Account No. 3404002598 held in the name of Boyoner Gemilas Chessed at Capital One Bank (formerly North Fork Bank), previously identified as "BGC Account #2."

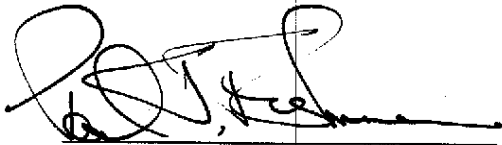
If any of the above-described forfeitable property, as a result of any act or omission of ALTMAN:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of ALTMAN up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

A handwritten signature in black ink, appearing to read "Paul J. Fishman", written over a horizontal line.

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 10-53(JLL)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

MOSHE ALTMAN

INDICTMENT FOR

18 U.S.C. §§ 666(a)(2), 1951(a),
1956(a)(3), 1956(h) & § 2
18 U.S.C. §§ 981(a)(1), 982(a)(1)
28 U.S.C. § 2461

**BRADLEY A. HARSCH
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
(973) 645-2700**